

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**UNITED STATES OF AMERICA and
COMMONWEALTH OF
MASSACHUSETTS *ex rel.* JULIO
ESCOBAR and CARMEN CORREA**

Relators–Plaintiffs,

v.

**UNIVERSAL HEALTH SERVICES, INC.,
UHS OF DELAWARE, INC., and HRI
CLINICS, INC.**

Defendants.

C.A. No. 11-CV-11170-DPW

JOINT STATUS REPORT

In response to the Court’s July 26, 2019 Order (ECF No. 280) that the Parties provide the Court with reports every 30 days concerning the status of the case and settlement negotiations, the Commonwealth of Massachusetts (the “Commonwealth”) and Relators Julio Escobar and Carmen Correa (collectively, the “Relators”), together with Defendants Universal Health Services (“Universal”), UHS of Delaware, Inc. (“UHS-DE”), and HRI Clinics, Inc. (“HRI”) d/b/a Arbour Counseling Services (“Arbour”) (collectively, “Defendants”) jointly file this status report.

As noted previously, the United States, the Commonwealth, and Defendants have agreed in principle on a settlement and are working to memorialize the remaining terms. (Relators have not yet determined whether they will assent to the settlement agreement.) The United States, the Commonwealth and the Defendants have circulated a number of draft settlement agreements, provided comments thereon, and have had several telephonic conversations regarding the

agreement's terms. The United States, the Commonwealth and Defendants believe that execution of a final settlement agreement may take 1-to-2 months from the filing of this report. Accordingly, the Parties jointly request that the Court continue to stay all deadlines in this matter so they can focus on finalizing the terms of an agreement.

Respectfully submitted,

COMMONWEALTH OF
MASSACHUSETTS

By its attorney,

MAURA HEALEY
Attorney General

Dated: November 25, 2019

/s/ Philip Schreiber
Philip Schreiber (BBO # 667288)
Assistant Attorney General
Medicaid Fraud Division
One Ashburton Place, 18th Floor
Boston, MA 02108
(617) 963-2167
philip.schreiber@mass.gov

UNIVERSAL HEALTH SERVICES, INC.,
UHS OF DELAWARE, INC., AND HRI
CLINICS, INC.

By their attorneys,

Dated: November 25, 2019

/s/ Laura McLane
Mark W. Pearlstein (BBO #542064)
Laura McLane (BBO # 644573)
Katrina Rogachevsky (BBO #691373)
MCDERMOTT WILL & EMERY LLP
28 State Street
Boston, Massachusetts 02109

Tel: (617) 535-4000
Fax: (617) 535-3800
mpearlstein@mwe.com
lmclane@mwe.com
krogachevsky@mwe.com

JULIO ESCOBAR &
CARMEN CORREA

By their attorneys,

Dated: November 25, 2019

/s/ Tom Greene
Thomas M. Greene (BBO #210020)
tgreene@greenellp.com
Michael Tabb (BBO #491310)
matabb@greenellp.com
Greene LLP
One Liberty Square, Suite 1200
Boston, MA 02109
(617) 261-0040

CERTIFICATE OF SERVICE

I certify that, on November 25, 2019, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Philip Schreiber
Philip Schreiber